



BOULT • CUMMINGS
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101 OCT 31 PM 4 11

October 31, 2001

David Waddell, Esq.
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: All Telephone Companies Tariff Filings Regarding Reclassification of Pay
Telephone Service as Required by FCC Docket No. 96-128
Docket No. 97-00409

Dear David:

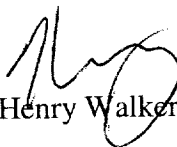
Pursuant to the Hearing Officer's Order of October 9, 2001, enclosed is the Second Set of Data Requests from Tennessee Payphone Owners Association to Sprint/United Telephone-Southeast, Inc. concerning the cost study filed October 10, 2001 by Sprint United.

Copies have been forwarded to parties.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/nl
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: ALL TELEPHONE COMPANIES TARIFF FILINGS REGARDING
RECLASSIFICATION OF PAY TELEPHONE SERVICE.**

Docket No. 97-00409

**SECOND SET OF DATA REQUESTS FROM TENNESSEE PAYPHONE OWNERS'
ASSOCIATION TO SPRINT/UNITED TELEPHONE-SOUTHEAST, INC.**

DEFINITIONS

1. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of Sprint/United Telephone-Southeast, Inc. ("Sprint" or "United"), including but not limited to correspondence, memoranda, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including but not limited to electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, memoranda, correspondence, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

2. The term “refer or relate to” means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

3. The term “communication” means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including but not limited to conversations, telecommunications, and documents.

INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information which is physically within Company’s possession, custody or

control as well as in the possession, custody or control of Company's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any data request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each data request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

DATA REQUESTS

1. Refer to the worksheet entitled UTSE, Inc. "Loop Length Comparison."

a. Describe in detail the method that was used to develop the loop length by wire center for the columns "Avg. Payphone Loop Length" and "Avg. Loop Length."

b. Provide all workpapers or other supporting documentation used to develop the loop length by wire center.

c. Provide a complete list of services that were included when developing the "Avg. Payphone Loop Length."

d. Provide a complete list of services that were included when developing the "Avg. Loop Length."

2. Refer to the worksheet entitled "UTSE, Inc. Payphone Cost Comparison."

a. Describe in detail all changes in methodology, assumptions, inputs, or data that cause the entries in the column "USF ROR 5/1/2001 Filing" to differ from the entries in the "USF ROR Geocoded" column.

b. Explain in detail why Sprint chose to make each of the changes listed in response to part (a).

c. Provide all workpapers or other supporting documentation that include any of the changes listed in response to part (a).

3. Refer to Section G, Cost Model Methodology, page 6.

a. Provide the "geocoded payphone locations that determine loop costs specific to payphones."

b. Describe in detail how each of these "geocoded locations" was determined.

c. Describe in detail the capabilities of the "Sprint Loop Cost Model (SLCM), a modified version of the Benchmark Cost Proxy Model, Version 3.1 (BCPM) that made it possible for Sprint to "geocode" the payphone locations used in the study.

d. For each "geocoded" location, indicate the method used to "geocode" that payphone and the degree of accuracy that can be assured (e.g. street address, road segment, census block, etc.).

f. For any “geocoded” locations that were established through a proxy method (e.g. allocated to a given geographic area), identify the location and describe in detail the method used to assume the location used.

g. Provide the geocode success rate for each wire center studied.

h. Indicate whether Sprint used all payphone locations or a subset of payphone locations to develop its loop costs specific to payphones.” If a subset was used, provide a listing of both the locations used and the locations not used, and explain in detail how the contents of each category were chosen.

4. Refer to Section G, Cost Model Methodology, page 6.

a. Provide a listing of all inputs to the SLCM that “were updated to reflect current material prices.

b. For each changed input, provide the value used in: (1) the 3/16/2001 study, (2) the 5/1/2001 study, and (3) the 10/10/2001 study.

c. Provide all supporting documentation for these changes.

5. Refer to Section G, Cost Model Methodology, page 7.

a. Explain in detail how each of the payphone locations within UTSE territory were “geocoded to wire center maps.”

b. Provide a copy of the resulting map for each wire center. On each map, separately identify the locations that were successfully “geocoded” and those that were placed by a proxy method.

c. Describe in detail the method used to overlay the locations of the payphones on wire center maps, and the method used to enter this location data into the SLCM.

d. Describe in detail both the information obtained and the method used to obtain it “through reporting capabilities in the Review mode” of the SLCM.

e. Provide a copy of the maps requested in part (b) with only PTAS locations shown. In the alternative, provide a copy of the maps showing all payphone locations but with PTAS and other payphone lines separately identified. Whichever map is provided, TPOA is requesting that Sprint continue to separately identify the locations that were successfully “geocoded” and those that were placed by a proxy method.

6. Refer to Section G, Cost Model Methodology, page 7. The “average cost calculation” section contains the following statements: “the forward looking loop cost for pay telephones is based on the loop cost developed using the above methodology. To determine the cost of pay telephone loops, the number of payphones by exchange is used to determine the statewide weighted average cost of a pay telephone loop.

a. Describe in detail the wire center specific investment that is being weighted to calculate the statewide average. Indicate whether this investment, prior to the weighting process, is (1) specific to payphones, (2) specific to PTAS. If Sprint asserts that the wire center level investment, prior to weighting, is specific to either payphones or PTAS, explain in detail why this is the case.

7. Refer to Section H, page 4 of 4 of the 10/10/2001 study and Section H, page 39 of the 5/1/2001 study.

a. Indicate whether these worksheets are intended to present a comparable set of information. If not, provide a reference to appropriate worksheets in each study that will permit TPOA to compare the wire center specific investments and the method used to develop the statewide weighted average cost.

b. The referenced page of the 5/1/2001 study states “source of payphone demand: CM – December 31, 2000.” Describe this data source in detail and explain why it was used.

c. Provide a comparable data source, vintage, and description for the payphone demand assumed in the 10/10/2001 study.

d. The referenced page of the 5/1/2001 study contains a column entitled “payphone weighting.” Explain in detail how the values in the this column were developed, including a listing of the services used in both the numerator and denominator.

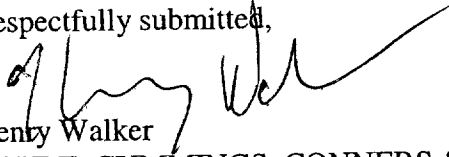
e. The referenced page of the 10/10/2001 study contains a column entitled “percent of total lines.” Explain in detail how the values in the this column were developed, including a listing of the services used in both the numerator and denominator.

f. The referenced page of the 5/1/2001 study contains a column entitled “total cost.” The referenced page of the 10/10/2001 study contains a column entitled “monthly cost (TELRIC).” Describe in detail what the entries in these columns are intended to represent.

g. Provide the appropriate entries for the “percent of total lines” column if only PTAS lines are included in the numerator.

h. Provide the appropriate entries for the "monthly cost (TELRIC)" column if only PTAS lines are used to develop the wire center specific investments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Henry Walker", is written over the typed name.

Henry Walker

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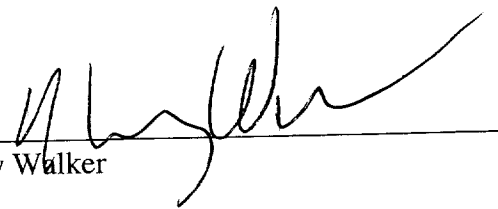
Counsel for Tennessee Payphone Owners' Association

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2001 a copy of the foregoing document was served on the parties of record, via U.S. Mail, addressed as follows:

James Wright, Esquire
United Telephone-Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587

Tim Phillips, Esq.
Consumer Advocate Division of the Attorney General's Office
426 5th Ave., North, 2nd Floor
Nashville, TN 37243


Henry Walker